



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue
Seattle, Washington 98101
December 15, 1995

Reply to
Attn. of: HW-106

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DEPT. OF ECOLOGY

Mr. John Stiller
Philip Environmental, Inc.
955 Powell Avenue S.W.
Renton, WA 98055-2908

Re: Decrease Monitoring Frequency Request at the Philip
Environmental Inc. Pier 91 Facility
EPA ID Number WAD 00081 2917

Dear Mr. Stiller:

This correspondence is in response to the Philip
Environmental letter dated June 29, 1995.

The US Environmental Protection Agency (EPA) Region 10
intends to transfer the corrective action authority to Ecology
when they have either issued a Model Toxic Control Act (MTCA)
Order or the corrective action portion of the RCRA permit. EPA
considers Ecology to be the regulatory lead for the Pier 91
facility and until the transfer has taken place, EPA will
coordinate with Ecology on the issues involving corrective
action.

Pursuant to paragraph 36 of the 1990 agreed order, docket
number 1089-11-06-3008(h), EPA hereby concurs with Ecology's
recommendations.

If you have any questions, please contact Sally Safioles at
the Washington State Department of Ecology (206)649-7026.

Sincerely,

Diane Richardson
RCRA Permits Team

cc: Doug Hotchkiss, Port of Seattle
Mike Torpy, Pacific Northern Oil Company
✓ Sally Safioles, Ecology-NWRO
Julie Sellick, Ecology-NWRO
Hideo Fujita, Ecology -NWRO
Galen Tritt, Ecology-NWRO
Gerald Lenssen, Ecology-HQ
Bob Warren, Ecology-SWRO
Theresa Michelsen, Ecology-NWRO

USEPA RCRA

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

December 13, 1995

Mr. John Stiller
Philip Environmental, Inc.
955 Powell Avenue S.W.
Renton, WA 98055-2908

Dear Mr. Stiller:

Re: Decrease Monitoring Frequency Request at the Burlington
Environmental Inc. (dba Philip Environmental) Pier 91 Facility;
WAD 000812917

This correspondence is in response to the Philip Environmental (Philip) request submitted to the U.S. Environmental Protection Agency Region 10 Office (USEPA) dated June 29, 1995.

USEPA is in the process of transferring the corrective action authority for this facility to the Washington State Department of Ecology (Ecology); however, this transfer is not complete. The transfer of legal regulatory authority will occur when Ecology has either issued a Model Toxic Control Act (MTCA) Order which is incorporated by reference into the corrective action portion of the facility's RCRA permit, or has issued a corrective action portion of the RCRA permit with permit conditions; either can be issued under Ecology's authorized corrective action program. Also, EPA and Philip will need to jointly terminate the existing 3008(h) consent order. Until then, it will be necessary for Philip to continue to meet the requirements of the existing 3008(h) Order for RFI activities. To minimize any confusion and to aid in the transfer, EPA has agreed that Ecology will become the regulatory contact for Philip and will coordinate with USEPA on issues involving the continuing corrective action for the Pier 91 facility. Ecology will respond to Philip on issues such as this request. Until the transfer of corrective action is complete and the existing 3008(h) order is terminated, EPA will be placing a cover letter on Ecology's responses.

Based on the information provided, Ecology approves your request for the following changes: to reduce water level measurements from monthly to quarterly; to drop filtered metal analysis and sample only for total metal analysis; to sample wells with LNAPL semi-annually as per the approved Interim Measures Workplan instead of quarterly. Ecology will approve your revised sampling and analysis schedule for select wells based on the conditions stated below. Ecology may require additional or alternative work under a MTCA Order if warranted. Ecology will use the results of the revised sampling and analysis schedule for imposing any additional or alternative work. Ecology will not approve the "Extended Schedule" of your request until the

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revised sampling and analysis schedule has been implemented and enough information is collected to make decisions on changes to the sampling frequency. The following are our conditions for the revised sampling and analysis schedule:

Standards In General: This facility will eventually be transferred to Ecology for the continuation of RCRA corrective action. It is Ecology's intention to use the Model Toxic Control Act (MTCA) to address RCRA corrective action as per WAC 173-303-646(3). Under this mechanism, Ecology will use MTCA water quality cleanup standards as the decision criteria for evaluating what additional RCRA Facility Investigation (RFI) work is warranted, and what corrective measures may be required. Ecology recommends that the water quality samples be collected and compared to MTCA Method B (residential) as the primary standards or MTCA Method A for constituents such as TPH. Presently, data provided by BEI shows a wide range of detection limits many of which exceed the Method B cleanup standards for several compounds. These data, therefore, are inadequate for evaluating the need for additional investigations or corrective measures. The detection limits should consistently attempt to quantify MTCA B ground water standards. For those standards not presently attainable by present test methods, an acceptable practical quantitation limit (PQL) is to be used. Please refer to Ecology's Toxic Cleanup Program document Publication No. 94-49 Guidance on Sampling and Data Analysis Methods which discusses PQL's as MTCA standards (Appendix II). We recommend that a list of all constituents to be tested and the MTCA standard (or acceptable PQL) be prepared for the selection of an accredited laboratory that can meet these requirements.

The collection of these data now will hopefully expedite future investigation at this facility since this approach would be required under Ecology's lead for RCRA corrective action. These data can also be used for future changes in frequency of testing, constituents to be tested and the selection of standards as the data becomes available.

TPH Testing: The proposal indicates the testing for TPH-G and TPH-D in select wells. Total TPH should continue to be collected to screen for heavier hydrocarbons. The results to date show exceedences of the 1000 ppb TPH standard. The history also indicates that the facility has managed bunker fuels and lube oils. This information will be important during the Corrective Measure Study (CMS) and Corrective Measures Implementation (CMI) stages of corrective action.

PCB Testing: Based on the discussion above on standards and detection limits, PCBs should be testing in the deeper aquifer at least semi-annually.

Upgradient Wells: Since the writing of this proposal, wells 105A and 105B have been replaced by wells 205A and 205B respectively. It is assumed that the monitoring proposal for the 105 well cluster holds for the replacement wells. If this is not the case, Philip should clarify this in writing.

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Reporting: The RFI Workplan indicates that field data (temperature, pH, specific conductance) were also collected during sampling. Please report these results with the data submittals. Also on the data spreadsheet submittals please indicate the standards, highlight those results that exceed a standard, and note the CAS number for each constituent.

If you have any questions or comments on the review of your request, please call me at (206) 649-7026.

Sincerely,

Sally Safioles

Sally Safioles
Hydrogeologist
Hazardous Waste and Toxics Reduction Program

cc: Doug Hotchkiss, Port of Seattle
Mike Torpy, Pacific Northern Oil Company
Diane Richardson, EPA Region X
Julie Sellick, Ecology-NWRO
Hideo Fujita, Ecology-NWRO
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